

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

COUNTY OF MECKLENBURG

SUPERIOR COURT DIVISION

08 CvS 9873

TECHNOLOGY PARTNERS, INC.,)

A North Carolina Corporation,)

Plaintiff,)

v.)

BRIAN HART,)

Defendant.)

AFFIDAVIT OF
IOANNIS PAPAIOANNOU

NOW COMES Affiant, IOANNIS PAPAIOANNOU, being first duly sworn, and deposes as follows:

1. I am over the age of eighteen, suffer no legal disabilities, have personal knowledge of the facts set forth below, and I am competent to testify. I currently reside in Mecklenburg County, North Carolina.
2. I am currently employed as the Vice President of Technology Partners, Inc., plaintiff in the above styled action.
3. Technology Partners, Inc. serves clients in the following states: Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Florida, Georgia, Illinois, Kansas, Kentucky, Massachusetts, Maryland, Michigan, Missouri, Mississippi, North Carolina, New Jersey, New Mexico, New York, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Washington, and the Virgin Islands.
4. Technology Partners, Inc. has remote home office locations in Birmingham, Alabama, Monroe, Ohio, and Albuquerque, New Mexico.
5. In connection with my employment, I have personal knowledge of the general employability of software application developers in the Mecklenburg County, North Carolina areas.
6. Based on my general knowledge in the industry, there are a number of non-medical billing software positions available that a person with Brian Hart's experience and skill level could obtain in the Mecklenburg County, North Carolina area.
7. For example, a quick search of the job website Monster.com reveals approximately 43 positions available within a 30 mile radius of Charlotte, NC for software engineers with 5-7 years of experience under the following job

categories: Enterprise Software Implementation & Consulting; General/Other: IT/Software Development; Software/System Architecture and Software/Web Development.

8. Beginning on Sunday, May 4, 2008, there is a RBMA Radiology Summit 2008 trade show. Mr. Hart's new employer, Amicas, typically attends this trade show. It would be damaging to our customer relationships for Mr. Hart to appear at this trade show on behalf of our competitor, Amicas.
9. Further, this affiant sayeth not.

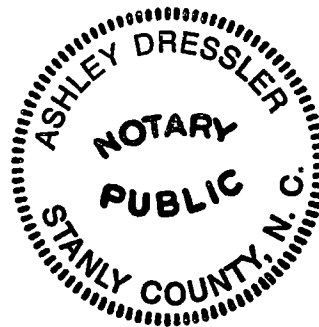
This is the 1st day of May, 2008.

Signature of Affiant

Sworn and subscribed before me this 1st day of May, 2008.

Ashley Dressler
Notary Public

My Commission Expires: 6/7/2011.

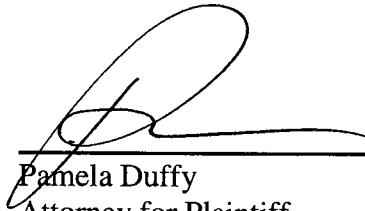


CERTIFICATE OF SERVICE

The undersigned does hereby certify that she has this day duly served a copy of the foregoing **Affidavit of Ioannis Papaionnou** by hand delivery at the Temporary Restraining Order on May 1, 2008 to:

Kurt E. Lindquist, II
Nelson Mullins Riley & Scarborough, LLP
100 North Tryon Street, 42nd Floor
Charlotte, NC 28202-4007

This the 1st day of May, 2008.



Pamela Duffy
Attorney for Plaintiff
WISHART, NORRIS, HENNINGER
& PITTMAN